NATIONAL PATTERN UPDATE

Absence of Direct Comparative Analysis:

Infrastructure Investment versus Managed Retreat

Formal Confirmation from Te Waihanga (New Zealand Infrastructure Commission)

July 2026 | Public Interest Synthesis

1. Executive Summary

On 21 July 2026 the New Zealand Infrastructure Commission (Te Waihanga) issued a formal decision under the Official Information Act (OIA26-TW16). In that decision the Commission stated, in clear terms:

> *"The Commission has not prepared any direct analysis of the costs, benefits, risks or long-term fiscal implications comparing infrastructure investment relative to managed retreat."*
>
> *"The Commission has not undertaken analysis of long-term Crown or ratepayer liabilities associated with managed retreat or loss of rateable base."*

This is a significant formal admission. Te Waihanga is the central government body charged with advising on long-term infrastructure strategy. The absence of direct comparative analysis and liability modelling at this level strengthens the national pattern previously documented across multiple local authorities: that decisions and public messaging around managed retreat are occurring in the relative absence of transparent, published cost-benefit and long-term fiscal analysis comparing it with major infrastructure protection options.

2. The Te Waihanga Decision (OIA26-TW16)

Request date: 30 June 2026. Formal decision letter dated 21 July 2026 from Peter Nunns, General Manager Strategy.

Part 1 – Comparative Analysis

The Commission confirmed it has prepared **no direct analysis** comparing the costs, benefits, risks or long-term fiscal implications of major infrastructure investment (flood protection, drainage upgrades, stopbanks, pumping stations) versus managed retreat or property acquisition pathways. The publicly available "Invest or Insure" report is described as a framework using illustrative case studies rather than specific national or project-level comparative analysis.

Part 2 – Long-term Liabilities

The Commission confirmed it has undertaken **no analysis** of long-term Crown or ratepayer liabilities associated with managed retreat, property acquisition, or loss of rateable base. Existing national-scale loss estimates provide general figures on potential financial losses from natural hazards but are not specific Crown or ratepayer liability assessments.

Part 3 – Advice to Other Agencies

No information was identified. This part of the request was refused under section 18(e) of the OIA (information does not exist).

3. How This Fits the National Pattern

This formal confirmation from Te Waihanga aligns with and strengthens the pattern previously documented through LGOIMA requests and public document analysis across multiple councils and agencies:

- **Limited or absent published comparative analysis** – Many councils default to evacuation and managed retreat messaging during weather events while providing minimal transparency on the current condition, capacity, and maintenance status of existing flood protection infrastructure, or on the relative long-term costs of major upgrades versus retreat pathways.
- **Risk transfer without full fiscal accounting** – The absence of clear long-term liability analysis at both national and local levels means the fiscal consequences of large-scale managed retreat (loss of rateable base, acquisition costs, residual risk) are not being fully quantified and presented to the public or elected members alongside infrastructure options.
- **High-level adaptation language displacing detailed engineering baselines** – Across several regions, older detailed engineering and infrastructure condition assessments have been superseded by higher-level adaptive pathways and retreat-focused planning documents, often with reduced transparency on the comparative performance and cost of protection options.
- **Consistent procedural responses** – Multiple agencies have responded to requests for comparative analysis by pointing to general public reports, asserting the information is publicly available, or confirming that specific comparative or liability work has not been undertaken.

The Te Waihanga decision is particularly significant because it comes from the national body responsible for long-term infrastructure strategy. If that body has not produced direct comparative analysis or liability modelling, the information gap is structural rather than merely local.

4. Implications

The combination of (a) active public messaging and planning around managed retreat at local level, and (b) the confirmed absence of direct comparative cost-benefit and long-term liability analysis at the national infrastructure body, creates a transparency and accountability deficit. Ratepayers, property owners, and elected members are being asked to accept significant pathway decisions without a clear, published evidence base that weighs the full long-term costs of retreat against the costs and benefits of major infrastructure investment.

This does not prove that managed retreat is always the wrong choice. It does demonstrate that the analytical foundation for preferring it over infrastructure-led approaches remains incomplete at the highest strategic level.

5. Practical Implications for Ongoing Work

This formal admission should be retained as a core piece of the public interest record. It can be referenced in:

1. Further LGOIMA and OIA requests to other agencies (Treasury, Ministry for the Environment / MCERT, regional councils) asking specifically whether they hold the comparative and liability analysis that Te Waihanga has confirmed it does not hold.
2. Briefings to engaged elected members and independent engineers who are examining local managed retreat proposals (including South Dunedin and other high-profile areas).

3. Any future public or parliamentary scrutiny of the National Adaptation Framework and related infrastructure funding decisions.
4. Archive.org and other durable public repositories as part of the longitudinal record of information gaps in hazard and adaptation decision-making.

6. Document Status

This update is prepared as a public interest synthesis. It draws solely on the formal OIA decision issued by Te Waihanga on 21 July 2026 and previously documented patterns of limited comparative analysis across local government. It is intended for use by researchers, elected members, engineers, and members of the public seeking a clear record of the current state of national-level analysis on this issue.

Source document: Te Waihanga letter OIA26-TW16, 21 July 2026, Peter Nunns, General Manager Strategy.

Prepared: July 2026
Status: Public interest record – may be freely shared and archived.